

**REMARKS**

**Status of the Claims**

- Claims 1-17 are pending in the Application after entry of this amendment.
- Claims 1-17 are rejected by the Examiner.

**Claim Rejections Pursuant to 35 U.S.C. §102**

Claims 1-17 stand rejected pursuant to 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,185,663 to Burke. The Applicants respectfully traverse the rejection.

Burke discloses a shared persistent memory file system that provides persistent memory block allocation with multiple redo logging of memory blocks. The file system employs a three part block state indicator (V,A,U). V is a volume indication. A is an allocation sequence indication. U is an update sequence number indication. The file system (a) generates indication of the allocation sequence in the allocation map in a manner free of initially reading the block from storage memory, (b) records the indication of volume, allocation sequence and update sequence in an entry of the transaction log of the requesting computer node, and (c) sets indications of volume, allocation sequence and update sequence on the subject block in storage memory. The file system includes redo recovery means for updating blocks in the storage memory upon a failure in the computer system. For each block being updated, the recovery means utilizes one transaction log and the block state indicators recorded therein corresponding to indications of volume and update sequence in the block in storage memory. (Abstract)

Applicant submits that Burke fails to teach all of the structural elements of independent Claims 1, 7 and 12. Also, Applicant submits that the invention of Burke would not function without the three part block state identifier which is absent in the independent claims of the present invention.

Claim 1 recites:

A method of generating recoverable units in a database, the method comprising:  
partitioning the database into a first and a second unit;

creating a primary catalog comprising metadata of logical elements of the units, the primary catalog referencing the units;

creating multiple logs such that any one unit is associated with only one log;

creating two secondary catalogs, each secondary catalog corresponding to a respective unit and comprising metadata of physical elements for the respective unit;

linking the primary catalog to the secondary catalogs; and

maintaining the secondary catalogs such that the first unit is recoverable independently from the second unit.

Applicant respectfully disagrees that the Examiner has found all of the elements of Claim 1 in Burke. For example, Applicant submits that the primary catalog and the secondary catalog are separate elements. See, items 402 and 420 respectively in Figure 4 of the present application. Yet, the Examiner cites the same portion in Burke (col. 3, lines 55-61) for both the primary and secondary catalog. (See Office Action dated 11/30/2005. The specific rejection for primary catalog element of Claim 4 and the rejection for secondary catalog element of Claim 5 cite the same general portion of Burke.)

The cited portion of Burke (col. 3 lines 55-61) teaches file system metadata blocks after discussing user data memory blocks in col. 3 lines 47-50. The cited portion of Burke includes a teaching of how “A file system may reserve part of the memory storage to hold an array of one metadata block for each file These blocks, sometimes called file headers, hold file attributes. They may be organized as an array so that file attributes may be indexed by a file number.” (Col. 3 lines 59-63.)

Yet, Applicant is unable to identify where Burke teaches the elements of creating a primary catalog comprising metadata of logical elements of the units and creating two secondary catalogs, each secondary catalog corresponding to a respective unit and comprising metadata of physical elements for the respective unit as recited in Claim 1.

The Examiner also cites Figures 1, 3A, and 3B of Burke for the second catalog. (page 2 of present Office Action). Yet, Applicant is respectfully unable to locate where in the Figures the explicit teaching of a secondary catalog, corresponding to a respective unit and comprising metadata of physical elements for the respective partitioned unit may be found. Likewise, the Examiner cites Figure 1 as the teaching of a link between the primary and secondary catalogs. Yet, the Applicant is unable to identify any cited link between the

primary catalog comprising metadata of logical elements and a separate secondary catalog comprising metadata of physical elements as recited in Claim 1.

The Examiner cites Burke col. 2 lines 57-67 and col. 4 lines 49-56 as maintaining the secondary catalogs such that the first unit is recoverable independently from the second unit. Yet, Applicant submits that the discussion of "Before State Identifiers" (BSI) and the matching of a "defining state identifier" (DSI) of the cited lines in column 2 does not teach the maintenance of secondary catalogs. Likewise Applicant finds the teaching of recovery means of a transaction log and a block state identifier with the required indications of volume, allocation sequence, and update sequence of the lines in column 4 of Burke does not disclose "maintaining the secondary catalogs such that the first unit is recoverable independently front the second unit" as recited in Claim 1.

Applicant respectfully disagrees that the Examiner has identified all elements of recited Claim 1 in Burke. Likewise independent Claims 7 and 12 have similar elements not found in the teachings of Burke. Also, Claims 1, 7 and 12 do not recite the elements of a volume indicator, an allocation sequence, and an update sequence as relied upon in Burke at col. 4 lines 49-56. Applicant respectfully submits that the structure of the Burke teachings is different than the structure of the elements of Claim 1.

Since Burke does not teach all of the elements of independent Claims 1, 7 or 12, Burke cannot anticipate these claims and their respective dependent claims under 35 USC §102(b). Applicants respectfully request withdrawal and reconsideration of independent Claims 1, 7, and 12 and their respective dependent claims as they patentably define over the cited art.

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**PATENT**

**Conclusion**

Applicants respectfully submit that the pending claims patentably define over the cited art. Applicants respectfully request reconsideration and withdrawal of the rejections. A Notice of Allowance for all pending claims is requested.

Respectfully Submitted,

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